

February 3, 2016

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VIA E-MAIL WOODARD.LAWANA@EPA.GOV

Regional Freedom of Information Officer
U.S. EPA, Region 4
AFC Building, 61 Forsyth Street, S.W., 9th Floor
Atlanta, GA 30303-8960

RE: Supplemental Freedom of Information Act Request -
Lee's Lane Landfill Superfund Site, Louisville, Jefferson County, KY
Lat/Long: 38.191110, -085.883060; EPA ID: KYD980557052

Dear Ms. Woodward:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, this letter is a supplemental request for copies of all documents for the period July 2, 2015 (the date of the final production of documents by USEPA in response to the November 21/December 17, 2014 FOIA request) through the date of your final response to this request, concerning the Lee's Lane Landfill Superfund Site ("Site") located in Louisville, Jefferson County, Kentucky, including but not limited to the following:

- (1) Documents regarding the original allocation of liability and costs among all potentially responsible parties (PRPs) at the Site;
- (2) Documents detailing activities and funds spent by the Louisville and Jefferson County Metropolitan Sewer District ("MSD"), pursuant to its Consent Decree;
- (3) Documents concerning the operation, maintenance and repair of the landfill gas ("LFG") system at the Site;
- (4) Documents regarding past negotiation of institutional controls for the Site;
- (5) Documents concerning any complaints received regarding the Site since the implementation of the remedy;
- (6) Documents concerning bankruptcies among Lee's Lane Landfill PRPs;

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- (7) Documents concerning PRPs that were not parties to a Consent Decree with EPA or the Commonwealth of Kentucky;
- (8) Documents concerning sampling data for the Site since the implementation of the remedy; and
- (9) The Consent Decree with Ben Hardy or other Site owner(s).
- (10) copies of all letters sent from USEPA to residents in Riverside Gardens in December, 2015 related to soil gas and household vapor monitoring on the Lee's Lane Landfill where Donna Seadler is the project manager.

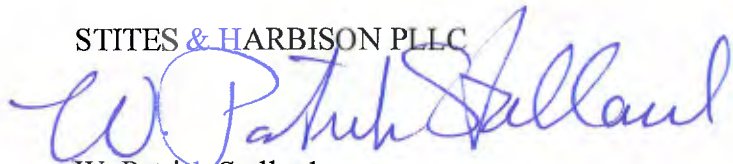
NOTE: specification (10) above is a new specification requesting documents that were not included in the previous November 21/December 17, 2014 FOIA request.

If it is possible, please provide electronic copies of the requested documents to pstallard@stites.com. If electronic copies are not available, please send copies of the requested documents in CD format to my attention at the address above. We are willing to pay reasonable processing fees up to \$250.00. Please contact me for authorization regarding processing fees that exceed \$250.00.

Thank you in advance for your cooperation.

Sincerely,

STITES & HARBISON PLLC



W. Patrick Stallard

WPS:cad

cc: John P. Sheesley (Sheesley.John@Epa.gov)